

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

United States of America,

Plaintiff,

v.

All Assets Listed on Schedule I
Attached Hereto and All Proceeds
Traceable Thereto,

Defendants *in rem*.

Civil Action No. 10 Civ. 4750 (JS)

ECF CASE

VERIFIED CLAIM AND STATEMENT OF
INTEREST OF CLAIMANT JEFFREY BROOKS,
INDIVIDUALLY, AND ON BEHALF OF
JEFFREY BROOKS IRA

Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimant Jeffrey Brooks, Individually and on behalf of Jeffrey Brooks IRA (the "Claimants"), hereby makes this formal claim and asserts his interest in certain of the Defendants *in rem* in this action and hereby serve notice of his objection to any and all claims against his right, title and interest in said Defendants *in rem*, his right to restitution of the Defendants *in rem* and his right to defend the action.

In particular, Claimant has a claim to, interest in, and right to the following assets listed in Schedule I of the Verified Complaint *In Rem* filed in this action on or about October 15, 2010, by virtue of his ownership and/or beneficiary interest in Jeffrey Brooks IRA:

1. \$9,740,625.02 on deposit at Jefferies & Company account 605-00046 in the name of Perfect World Partners (Schedule I, Item No. 89), by virtue of the membership interest of Jeffrey Brooks IRA in Perfect World Partners.

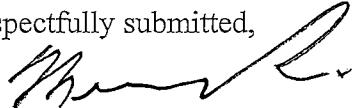
The interest in the Defendants *in rem* by virtue of which Claimant demands its restitution and the right to defend the action is all of the right, title and interest in said Defendants *in rem* as described herein.

Claimant also asserts claims on his behalf in any Defendant *in rem* not specifically identified above as to which Claimant may have an ownership or other interest or right of claim. Claimant expressly reserves the right to amend, modify and/or supplement this Verified Claim and Statement of Interest in any respect.

Pursuant to Rule E(8) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, Claimant appears before this Court for the limited purpose of asserting his rights to the Defendants *in rem*. Claimant's appearance in this action does not constitute an appearance for purpose of any other claim or consent to the jurisdiction of this Court or any other court over Claimant.

Dated: April 6, 2011

Respectfully submitted,



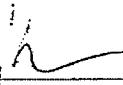
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Attorney for Claimant Jeffrey Brooks,
Individually

VERIFICATION

I, Jeffrey Brooks, verify under penalty of perjury that I have read the foregoing Verified Claim and Statement of Interest and the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 6, 2011 at New York, New York.



Jeffrey Brooks

Sworn to before me this 6th day of
April 2011



Notary Public

My commission expires: November 15, 2014

MOJARATOU MAREME SY GORSKI
Notary Public - State of New York
No. 01SY6230990
Qualified in Kings County
My Commission Expires November 15, 2014

CERTIFICATION OF SERVICE

I hereby certify that on April 6, 2011, true and correct copies of the attached Verified Claim and Statement of Interest were served by mail and filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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Merrill Rubin